

1 I. NEEL CHATTERJEE (STATE BAR NO. 173985)
nchatterjee@orrick.com
2 MONTE M.F. COOPER (STATE BAR NO. 196746)
mcooper@orrick.com
3 THERESA A. SUTTON (STATE BAR NO. 211857)
tsutton@orrick.com
4 MORVARID METANAT (STATE BAR NO. 268228)
mmetanat@orrick.com
5 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
6 Menlo Park, CA 94025
Telephone: 650-614-7400
7 Facsimile: 650-614-7401

8 Attorneys for Plaintiff
FACEBOOK, INC.

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 FACEBOOK, INC.,

14 Plaintiff,

15 v.

16 POWER VENTURES, INC. a Cayman Island
17 Corporation; STEVE VACHANI, an
individual; DOE 1, d/b/a POWER.COM,
18 DOES 2-25, inclusive,

19 Defendants.

Case No. 5:08-cv-05780 JW

**JOINT STIPULATION PURSUANT
TO THE COURT'S AUGUST 18, 2011
ORDER GRANTING PLAINTIFF'S
MOTION TO COMPEL**

Judge: Hon. James Ware
Courtroom: 15, 18th Floor

Pursuant to the Court's August 8, 2011 Order Granting Plaintiff's Motion to Compel (Dkt. No. 127), Plaintiff Facebook, Inc. ("Facebook") and Defendants Power Ventures, Inc. ("Power") and Steven Vachani (collectively "Defendants"), by and through their respective counsel of record, hereby stipulate to the following with regards to how Defendants' source code shall be produced and reviewed:

1. Facebook's review of Defendants' source code will commence on and after August 23, 2011 at the Office of Bursor & Fisher, P.A., located at 2121 North California Blvd., Suite 1010, Walnut Creek, CA 94596.

2. Pursuant to the Section 8 of the Parties' February 4, 2011 Stipulated Protective Order, Defendants' source code shall be made available for inspection on a secured computer in a secured room without Internet access or network access to other computers. The secured computer shall have all external data access ports disabled, including, but not limited to, external media drives, USB slots, and/or peripheral slots. This review will be conducted by one or more consultants and/or experts from Zeidman Consulting, as Facebook disclosed to Defendants on July 14, 2011 pursuant to Section 7.4(a) of the Stipulated Protective Order.

3. In conjunction with Section 8 of the Parties' Protective Order, Facebook's experts shall be permitted to install onto the secured computer, software by the name of "Understand" to facilitate the review of Defendants' source code.

4. Pursuant to Section 8(e) of the Parties' Protective Order, the Parties shall maintain an inspection log of any individual who has inspected any portion of the source code in electronic or paper form. Attached hereto as **Exhibit A** is a true and correct copy of the inspection log to be maintained by the Parties.

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1 **IT IS SO STIPULATED.**

2 Dated: August 31, 2011

ORRICK, HERRINGTON & SUTCLIFFE LLP

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5 /s/ Morvarid Metanat /s/

MORVARID METANAT
Attorneys for Plaintiff
FACEBOOK, INC.

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8 Dated: August 31, 2011

BURSOR & FISHER, P.A.

9
10 /s/ L. Timothy Fisher /s/

L. TIMOTHY FISHER
Attorneys for Defendants
POWER VENTURES, INC. AND STEVE
VACHANI

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14 **Filer's Attestation:** Pursuant to General Order No. 45, §X(B), I attest under penalty of
15 perjury that concurrence in the filing of the document has been obtained from its signatory.

16 Dated: August 31, 2011

Respectfully submitted,

17
18 /s/ Morvarid Metanat /s/

MORVARID METANAT

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20 **IT IS SO ORDERED:**

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22 Dated: _____

23 Honorable James Ware
United States District Chief Judge